In Europe, the current ADI has been set at 0.3 mg per kg of bodyweight per day (written as 0.3 mg/ kg bw/d),82 while in the United States glyphosate's allowable daily intake is nearly 6 times higher at 1.75mg/kg bw/d.

These wide differences in allowable daily residue to the control of the table of table of the table of the table of the table of tab

These wide differences in allowable daily residue exposure mean that U.S. citizens are legally exposed to nearly 6 times the amount of glyphosate on a daily basis than individuals in Europe.

Changes in Daily Exposure Based on Industry Science, at Monsanto's Request and a History of Scientific Fraud

In the case of glyphosate, this Acceptable Daily Intake level has been based on limited scientific studies presented to the EPA by glyphosate's original applicant for approval, Monsanto. As in Europe, the U.S. EPA has historically made these decisions based on corporate in-house scientific studies that have never gone through the peer review process, nor has any of the original data from these studies reported to regulatory agencies ever been made public.

More importantly, the differences in current Acceptable Daily Intake levels between the European Union and the U.S. are significant, do not represent the best or most current scientific data and are shrouded in controversy. This is not to say that this report endorses the European Union standard, which recent scientific evidence suggests establishes a tolerance too high to be guaranteed to safeguard human health.

U.S. Acceptable Daily Intake for Glyphosate (ADI) Originally Set by EPA at 0.1 ppm

According to internal EPA documents, the original ADI set by the EPA toxicology division was 0.1 mg/kg/day in the early 1980s.⁸³ During this same period under the Reagan Administration, in 1985, the EPA classified glyphosate as a possible carcinogen, Class C, based on a long-term feeding study in which male mice fed glyphosate developed kidney tumors.⁸⁴

The EPA initially defended this position, but Monsanto successfully submitted "historical control data" from multiple other unpublished studies and in a June 26, 1991 memo, the EPA reclassified glyphosate as Class E or "non-carcinogenic for humans" after much back-and-forth for several years with Monsanto scientists and lobbyists "based upon lack of convincing carcinogenicity evidence in adequate studies in two animal species."85

While Monsanto and other chemical manufacturers in the United States defend the low toxicity of Roundup and other glyphosate-based herbicides,

regulators in Europe took a more cautious scientific approach in setting the Acceptable Daily Intake limits for their citizens.

Rather than take Monsanto's approach on allowable levels, in its 1998 evaluation of glyphosate, Germany's Federal Office of Consumer Protection and Food Safety (BVL) determined that the allowable residue level should be set at 0.3 mg per kilogram of body weight, versus the high level of 1.75 ppm set by the EPA, or nearly 6 times higher than acceptable levels allowed in Europe based on industry feeding trials that they believed to be the most sensitive to the effects of the chemical.⁸⁶

The decision-making process of the German government's Consumer Protection and Food Safety agency was spelled out in a public document that stated obvious concern over the high ADI chosen by their U.S. counterparts at the EPA. According to the BVL glyphosate review:

"A very high ADI of 1.75 mg/kg bw was proposed in the joint dossier of Monsanto and Cheminova and is based on the NOEL for maternal toxicity in a teratogenicity study in rabbits (Tasker, 1980). It is discussed here since it is far outside the range of all the other suggested values."

"BY Washington Tasker of the property of the study in rabbits (Tasker, 1980). It is discussed here since it is far outside the range of all the other suggested values."

The German review document details the thencurrent ADI level requests by various chemical manufacturers based on industry-approved studies made available to respective food safety agencies around the world in the 1990s. These original Acceptable Daily Intake levels range from 0.05 to 0.1 mg/kg bw/day, 0.15 mg/kg bw/day and 0.3 mg/kg bw/day and the requested U.S. level of 1.75 mg/kg bw/day submitted by Monsanto and Danish pesticide maker Cheminova. (See original chart on page 16)

It's interesting to note that the U.S. ADI level of I.75 mg/kg bw/day is 17.5 times the original ADI set by the EPA in the 1980s⁸⁸ and was obviously raised in anticipation of the approval of future GMO crops. Monsanto had already begun advance work on engineering genetically modified crops that were design to survive being sprayed with their proprietary flagship herbicide Roundup.

In their 1998 review of glyphosate, German regulators stated their objections to the EPA and Monsanto's ADI request in clear scientific terms:

"The acceptable daily intake should be based on the highest dose at which no adverse effect is observed in the most appropriate study in the most sensitive species. In the case of glyphosate, the different notifiers have proposed ADI values which cover a wide range between 0.05 and 1.75 mg/ kg bw (see table B.5.10.2-1). This variance is due to the different studies used as

the respective basis for ADI calculation but may also result from a controversial evaluation of controversial studies.

A very high ADI of 1.75 mg/kg bw was proposed in the joint dossier of Monsanto and Cheminova and is based on the NOEL for maternal toxicity in a teratogenicity study in rabbits (Tasker, 1980). It is discussed here since it is far outside the range of all the other suggested values. This proposal was not accepted by the Rapporteur for the following reasons:

- The NOEL for maternal toxicity in the respective study was established by the Rapporteur at 75 mg/kg bw/day instead of 175 mg/kg bw/day (see section B.5.6.2.2.2).
- 2. If a NOEL of 175 mg/kg /bw/day for the above mentioned rabbit study would have been accepted, one could identify some valid studies revealing adverse effects at lower doses. In a recent long-term study in rats (Suresh, 1996), effects occurred in female animals at a dietary dose level of 1000 ppm (ca 60/mg/bg bw/day). The NOELs [No Observed Effect Level] and LOELs [Lowest Observed Effect Level] are Level] and surther chronic rat study (Atkinson et al., 1993) and in two other rabbit teratogenicity studies (Suresh, 1993; Brooker et al., 1991) were well below 175 mg/kg bw/day."

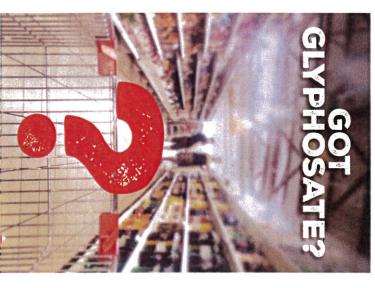
Usually, a chronic rat study is considered most appropriate to derive the ADI. Since the rat proved the most sensitive species upon long-term exposure, it is suggested to establish the ADI for glyphosate on the basis of the chronic toxicity data obtained in rats.⁸⁹

Current Scientific Research Calls for Much Lower Allowable Glyphosate Residues for Human Food Products

This spring, as regulators in the European Union attempted to re-register glyphosate for another 15 years, new independent scientific evidence was brought forward that called into question even the EUs more cautious 0.3 mg/kg bw/day allowable glyphosate residue level.

In the past 10 years alone, real scientific concern over the chemical's safety has only increased due to the widespread explosion in the use of Roundup and glyphosate-based herbicides in conjunction with industrial agriculture and further pressures on farmers to adopt GMO agriculture linked to herbicide tolerant traits.

In a study titled "Transcriptome profile analysis reflects rat liver and kidney damage following chronic ultra-low dose Roundup exposure," a team of international scientists performed a



transcriptome (gene expression) analysis of the liver and kidneys from rats fed an extremely low dose of Roundup. This resulted in a daily intake of glyphosate of only 4 nanograms per kilogram of bodyweight per day, which is 75,000 times below the EU acceptable daily intake (ADI equivalent) and 475,000 times below the US chronic reference dose (ADI equivalent). In other words, a dose of Roundup that was far below what is permitted by regulators and believed to be safe to consume on a daily basis over the long term was found to damage the liver and kidneys of rats. These results were statistically significant.⁹⁰

While transcriptome analysis is highly predictive of disease status or organs, it cannot predict the corresponding disease states with absolute certainty, as not all changes in gene function result in changes in levels of the genes' protein products and metabolites. Such definitive proof has to be provided by additional molecular profiling analysis, namely proteomics (protein profile) and metabolomics (small molecule metabolite profile). The proteomics and metabolomics analyses give a direct measure of the organ's composition, so they are able to provide a direct indicator of the health or disease status of the organ in question.

The authors concluded that long-term exposure to Roundup "at an ultralow, environmental dose can result in liver and kidney damage with potential significant health implications for animal and human populations."

-MESNAGE ET AL, 2015

A separate study looked at the evidence for teratogenic effects (birth defects) in the industry studies submitted to regulators to gain market authorization for glyphosate. The authors reviewed

the German government's original 1998 scientific analysis of allegedly safe daily glyphosate exposure levels and found that the government regulators had "introduced significant bias" into their review by intentionally excluding toxicity studies in rabbits that found harmful effects of glyphosate at much lower levels than their analysis admitted.^{91 92}

Simply by reviewing the same studies that the German government regulators did in 1998, the authors calculated that the EU acceptable daily intake level of glyphosate was currently 3 times higher than it should be if all the industry studies had been rigorously evaluated.

By including in their analysis two independent peerreviewed studies that had been completed since the
EU set the acceptable daily intake for glyphosate
residue in 2002, the authors concluded that current
ADI should be dramatically reduced to 0.025 mg/
kg bodyweight per day or "12 times lower than the
ADI proposed by the German regulators, which is
currently in force in the EU and used as a basis for
the maximum residue limit for food and feed."

Multi-Generational Rat Studies on Glyphosate with Recommended ADI Levels

Table B.5.10.2-1: Summary of ADI values proposed by the different notifiers and by the Rapporteur

	THE RESERVE THE PERSON NAMED IN		
Hotifier	ADI (mg/kg 10A	Textcological data on which this AD1 proposal is based	Remarks of the Repporteur
Monsanto/ Cheminova	1.75	Teratogenicity study in rabbits, NOEL: 175 mg/kg bw/d.	See discussion below.
Agrichem	0.1	3-generation study in rats, NOEL 10 mg/kg bw/d.	Based on published literature. Study not identified. Much higher NOELs have been established in more recent reproduction studies.
Alkaloida	0.06	12-month study in dogs, MOAEL: 300 ppm (5,79 - 14.62 mg/kg bw/d).	Supplementary study, NOAEL = highest dose tested.
Burclay	0.3	Chronic study in rats (MOEL 31 mg/kg bw/d) and 3-generation study in rats (MOEL 30 mg/kg bw/d) with reference to 1986 JMPR evaluation.	No original studies. In both cases, the NOELs were the highest cases tested. Both studies were considered supplementary only.
Feinchemie	0.05	Chronic study in rats, NOEL: 100 ppm (ca 5.5 mg/kg bw/d).	Interia report conclusion.
Herbex		Proposal for an ADI not submitted; appropriate studies not performed.	•
Luxan	0.15	Concerogenicity study in mice (NOSEL 150 ppm, ca 15 mg/kg ba/d) and 3-generation study in rats (NOSE 300 ppm, ca 15 mg/kg ba/d).	Suppplementary studies. In the reproduction study, NOEL = highest dose tested. Much higher NOELs have been established in more recent long-term and reproduction studies.
Nuferm		No toxicological data submitted.	
Sanachen	£.0	Published literature.	It is assumed that this value refers to the JMPR evaluation in 1986 (i.e. ADJ derived from a long-term rat study).
SCC/I.Pi.Ci.		Proposal for an ADI not submitted; appropriate studies not performed.	The company refers to the database of other notifiers.
Sinen (Shinung)	0.3	Published literature.	It is assumed that this value refers to the JMPR evaluation in 1986 (i.e. ADI derived from a long-term rat study).
Rapporteur	0.3	Summary of long-term studies in rats.	See discussion below.

Source: BVL, Germany. 1998. Monograph on Glyphosate

Monsanto and EPA Claim Roundup and Glyphosate Are Perfectly Safe: Science Says Otherwise

Roundup Formula 125 Times More Toxic than Glyphosate Alone

For decades, Monsanto has publicly claimed that glyphosate was perfectly safe and the company's Roundup herbicide formulations are: "tough on plants, but no more toxic to people and animals than table salt" or "practically non-toxic." 93

However, an increasing number of independent peer-reviewed studies have proven that glyphosate is not the most toxic ingredient in Monsanto's Roundup formulation. 9-35 Glyphosate is never applied to farmers' fields by itself. Instead, pesticide manufacturers create chemical formulations with added ingredients, called "inerts" or, "adjuvants," that are needed to penetrate the plant's cell walls to deliver glyphosate into the plant's growth structure. There it works to block the synthesis of three aromatic amino acids essential for growth and makes the plant susceptible to disease and "soil borne fungal pathogens." 96 97

According to an independent peer reviewed study published in the *International Journal of Environmental Research and Public Health* in 2014, scientists found that Roundup was 125 times more toxic than glyphosate alone:

"It is commonly believed that Roundup is among the safest pesticides. This idea is spread by manufacturers, mostly in the reviews they promote..., which are often cited in toxicological evaluations of glyphosate-based herbicides. However, Roundup was found in this experiment to be 125 times more toxic than glyphosate. Moreover, despite its reputation, Roundup was by far the most toxic among the herbicides and insecticides tested. This inconsistency between scientific fact and industrial claim may be attributed to huge economic interests, which have been found to falsify health risk assessments and delay health policy decisions."

As a result of new and emerging research, several European countries have not only banned Roundup and glyphosate for use in public parks or sale for home gardens, but the German and French governmental health and safety agencies have forced pesticide manufacturers to remove at least one inert ingredient or "co-formulant" from Monsanto's Roundup Classic and Roundup Original formulas.⁹⁹

For decades, the dangerous chemical known as polyethoxylated tallow amine (POEA), which is derived from animal fat, was a central ingredient in Monsanto's Roundup formula, making up to 15% of

the Roundup Original chemical mixture. As early as 2009 the prestigious Scientific American magazine reported that research scientists had found that:

POEA was more deadly to human embryonic, placental and umbilical cord cells than the herbicide itself - a finding the researchers call "actonishing" 100

According to the 2009 study, published in *Chemical Research in Toxicology*, "Moreover, the proprietary mixtures available on the market could cause cell damage and even death [at the] residual levels" found on Roundup-treated crops, such as soybeans, alfalfa, corn, and lawns and gardens.¹⁰

Scientific American further reported concerns from a team of research scientists, who "suspects that Roundup might cause pregnancy problems by interfering with hormone production, possibly leading to abnormal fetal development, low birth weights or miscarriages."

Despite these concerns and the mounting scientific evidence of likely harm from Monsanto's Roundup formulas, regulators at the USDA and EPA have failed to incorporate this new research into their consideration of Roundup's potential toxicity.

Glyphosate Bio-Accumulates in Major Organs and Bones

While Monsanto and U.S. regulatory agencies routinely claim that glyphosate is excreted quickly from the body, a number of studies in Europe have discovered higher levels of glyphosate residue found in cows raised in countries where GMO feed was allowed (Denmark) and significantly lower in areas considered "GM free" (Germany).¹⁰²

Despite Monsanto's repeated claim that glyphosate does not bio-accumulate, 103 this 2014 study found glyphosate residues in multiple organs of slaughtered cows, including the intestine, liver, muscles, kidney and spleen, bringing into question Monsanto's claim that glyphosate is rapidly excreted and does not bio-accumulate in animals or humans. Beyond accumulation in vital organs, glyphosate

beyond accumulation in vital organs, glyphosate has also been found to accumulate in bones due to its strong chelating activity or ability to bind with calcium. According to the EPA's own internal documents, reporting on corporate-paid studies submitted by Monsanto, a significant portion of glyphosate is absorbed into the bones of mice and rats used in laboratory experiments.

In 1993, in the EPA's Reregistration Eligibility Decision (RED) on Glyphosate as reported by the Office of Prevention, Pesticides and Toxic Substances: "Less than 1.0% of the absorbed dose remained in tissues and organs, primarily in bone tissue." ¹⁰⁴ The real question remains, what impact

on human health? does this steady accumulation in bone tissue have

residues than those who ate organic food. conventional diets had much higher glyphosate humans" and also discovered that humans who ate higher glyphosate residues in urine than healthy found that "chronically ill humans had significantly In a study on humans and livestock, scientists

published in the Journal of Environmental & Analytical Toxicology: According to the 2014 peer reviewed study

glyphosate residues in urine than healthy grouped according to the human health status. humans."105 Chronically ill humans had significantly higher Also the glyphosate residues in urine were with predominantly organic [fed] humans. humans [fed] conventional [food] compared 'Glyphosate was significantly higher in

series of recent independent peer-reviewed studies If these new findings weren't disturbing enough, a and kidneys of rats at ultra-low dose levels "in the based herbicides were likely to damage the liver found that low doses of Roundup or glyphosaterange of what are now generally considered 'safe'

defects, reproductive problems, infertility and even potential antibiotic resistance. normal gut bacteria, autoimmune diseases, birth weedkiller to endocrine disruption, disturbance of community linking Monsanto's most widely used dizzying pace, with concern in the scientific New scientific evidence of the harm from glyphosate continues to emerge at an almost

arthritis and non-Hodgkin's lymphoma share a common causative factor.¹⁰⁹ ¹¹⁰ with glyphosate exposure in the assessment by the World Health Organization's cancer agency IARC.¹⁰⁸ non-Hodgkin's lymphoma, which was correlated arthritis are associated¹⁰⁷ in other studies with an chronic inflammatory disorders such as rheumatoid These findings raise the possibility that rheumatoid increased risk of certain types of cancer, including New research is finding that some autoimmune and

glyphosate does accumulate in the bones of lab and the World Health Organization determined that the United Nations Food and Agriculture Program 2004 joint report on pesticide residues in food by or humans in any significant way, but a review of a that glyphosate did not bioaccumulate in animals For more than four decades, Monsanto has claimed

"Analysis of individual tissues demonstrated

of [14C] glyphosate equivalents (0.3-31ppm). The remaining tissues contained glyphosate that bone contained the highest concentration

Food Democracy Now! Glyphosate: Unsafe on Any Plate

statistically higher in males than in females."111 some highly perfused tissues, levels were 0.0003 and 11ppm (Table 3). In the bone and equivalents at a concentration of between

sprayed with high levels of Roundup, Monsanto's contain genetically engineered ingredients that were of processed foods, more than 75 percent of which have on the American public, which relies on a diet exposure to increasing levels of glyphosate residues flagship weedkiller? found in bone marrow, what impact does this daily are part of the body's immune system and can be cancer that starts in cells called lymphocytes, which The question is, since non-Hodgkin's lymphoma is a

Roundup was "safer than table salt" and "practically was "biodegradable" and to halt ads that claimed forced the company to stop claiming its weedkiller use of "false and misleading advertising," which New York state's attorney general in 1996 over its safety, the company was successfully sued by the Despite Monsanto's repeated claims of Roundup's

that it left the soil clean after use" and a small fine France being "found guilty of false advertising for in a former chairman of Monsanto Agriculture for Monsanto's French distributor,113 presenting Roundup as biodegradable and claiming A similar lawsuit was filed in France that resulted

Glyphosate Peer-Reviewed Science on

these studies can be found here that show the damage caused by glyphosate to human, animal and environmental health. Many of There are many independent peer-reviewed studies

summarized below: Some of the most important studies and reviews are

Cancer

- glyphosate-Roundup in Wistar rats. https://www. The teratogenic potential of the herbicide ncbi.nlm.nih.gov/pubmed/12765238
- conducted in 1979-1981 and 1988-1990. http:// www.inchem.org/documents/ehc/ehc/ehc159. this time. These long-term studies on rats were possible carcinogenic effects already existed at Two long-term studies on rats indicating

Human Epidemiological Studies Confirming Cancer Risk

types of blood cancer: association between Roundup exposure and two Studies in human populations have found an

An epidemiological study of pesticide



glyphosate herbicide was associated with higher applicators in the USA found that exposure to <u>nlm.nih.gov/pubmed/15626647</u> incidence of multiple myeloma. http://www.ncbi

- A systematic review of the literature published wiley.com/doi/10.1002/%28SICI%291097-Hodgkin's lymphoma. http://onlinelibrary. was linked with a higher incidence of non-Epidemiological studies conducted in Sweden found that exposure to glyphosate herbicide CNCR19>3.0.CO;2-1/full 0142%2819990315%2985;6<1353::AID-
- non-Hodgkin's Lymphoma. https://www.ncbi. between exposure to glyphosate herbicides and in 2014 concluded that there was an association <u>nlm.nih.gov/pubmed/24762670</u>

Endocrine Disruption (Hormone Hacking)

- Glyphosate herbicide was a potent EDC in rats, causing disturbances in reproductive development after exposure during puberty. https://www.ncbi.nlm.nih.gov/pubmed/20012598
- endocrine-disrupting effects of a glyphosate-This new Argentine study is the first to show pre-pubertal rats, supporting the possibility based herbicide on the uterus of newborn and

science/article/pii/S0300483X16300932 disruptors. http://www.sciencedirect.com/ that glyphosate-based herbicides are endocrine

articles/10.1186/s12302-014-0014-5 of rats. http://enveurope.springeropen.com/ confirmed in an experiment with larger numbers of increased incidence of mammary tumors in resulted in severe organ damage and a trend than that permitted in drinking water in the USA drinking water in the EU and 14,000 times lower equivalence - half of the level permitted in in drinking water diluted to 50ng/L glyphosate An in vivo study of Roundup administered to rats The latter observation of tumors needs to be emale animals over a 2-year period of exposure

Kidney and Liver Damage at Low Doses

A ground-breaking peer-reviewed study commonly exposed to in drinking water, altered herbicides which the general public are published in Environmental Health Journal in livers and kidneys of rats. http://ehjournal the gene function of over 4000 genes in the 2015 shows the levels of glyphosate-based

Binding of Vital NutrientsGlyphosate binds (chelates)

- Glyphosate binds (chelates) vital nutrients such as iron, manganese, zinc, and boron in the soil, preventing plants from taking them up. https://core.ac.uk/download/pdf/11741277, pdf?repositorvId=393
- Genetically Modified (GM) soy plants treated with glyphosate have lower levels of essential nutrients and reduced growth, compared with GMO and non-GMO soy controls not treated with glyphosate. http://link.springer.com/article/10.1007%2Fs11104-009-0081-3

Antibiotic Resistance

 Research lead by a team from the University of Canterbury, New Zealand found that commonly used herbicides, including Roundup, can cause bacteria to become resistant to antibiotics. http://mbio.asm.org/content/6/2/e00009-15

For Reference: Allowed Levels of Glyphosate in Drinking Water

- Council of the European Union. Council directive 98/83/EC of 3 November 1998 on the quality of water intended for human consumption. Off J Eur Communities. 1998. http://eur-lex.europa.eu/Lex.UriServ/Lex.UriServ.do?uri=OJL:1998:330:0032:0054:EN:PDE
- US Environmental Protection Agency (EPA).
 Basic information about glyphosate in drinking water. 2014. https://www.epa.gov/ground-water-and-drinking-water/table-regulated-drinking-water-contaminants



Glyphosate Exposure Levels in Humans: Healthy and Chronically Diseased

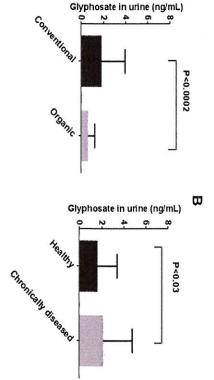


Figure 3: Gyphosate in humans. A) Comparison of glyphosate excretion with unine of humans with conventional (N=99) and predominantly organic (N=41) feeding. B) Glyphosate in healthy (N=102) and chronically (N=199) diseased humans.



How to Avoid Glyphosate

avoid unwanted glyphosate residues in my, or my of glyphosate in drinking water, rain and the air, the contamination in our food supply, as well as findings first question you might ask yourself, is how can I After reading this report, which confirms glyphosate family's, daily meals?

certainty what levels of glyphosate residue are actually in the food supply. at the results found in a wide range of popularly consumed foods, we simply cannot say with FDA registered laboratory. While we are alarmed food products. This report uses the regulatory round of independent testing of common American recognized "<u>gold standard</u>" testing methods of an The results presented in this report are the first

genetically engineered. Glyphosate residues are now found in food crops, such as wheat, oats and barley, confirm that glyphosate contamination is but they are also present in foods that are not widespread. Not only do high levels of glyphosate where glyphosate is used as a pre-harvest drying residues show up in obvious GMO products, These unprecedented pesticide residue tests

Harvest Spraying of Roundup High Glyphosate Levels as a Result of Pre-

In this initial round of testing, the two highest and proudly boast their Non-GMO status on the that intentionally do not contain GMO ingredients glyphosate residue levels were found on products

from their iconic cereal in 2014 and now market

In the case of Cheerios, General Mills removed GMOs

a daily basis. concerns for young children consuming this food on of glyphosate contamination, which poses health "whole grain oats," has resulted in the highest levels of Roundup on Cheerios number one ingredient Unfortunately, the practice of pre-harvest spraying engineered ingredients" and also "gluten free." the popular cereal as "Not made with genetically

levels, but not pesticide residues. and are actually certified by a third party, the Non-GMO Project, which test for GMO contamination Naked Pita Chips, which contain no GMO ingredients The next highest level was found in Stacy's Simply

more testing is needed. controls found glyphosate contamination. Obviously Even the two organic products that were tested as widespread and moves freely in the environment. This report reveals that glyphosate use is

An Organic Diet for 1 Week Reduces Pesticide Exposures by 90%

exposures to synthetic pesticides is to eat organic glyphosate contamination in food and to reduce from organic production, the simplest way to avoid Since GMOs and Roundup are both prohibited

exposed to 10 to 13 pesticide residues each day to this independent study, "the average person is system, as detected through urine tests.114 According eating an organic diet for as little as a week Environmental Research confirmed that families A 2014 study published in the Journal of from food, beverages and drinking water." removed more than 90% of the pesticides from their

Call to Action:

Based on these scientific findings, Food Democracy Now! is calling for:

- A federal investigation into the likely harmful popular American food products. high levels of glyphosate residues found in environment as a result of these disturbingly effects of glyphosate on human health and the
- reviewed in an open and transparent process. the most current scientific evidence can be The EPA to refuse to reapprove glyphosate until
- A permanent ban on the use of glyphosate as a beans, sunflowers, wheat, oats and barley. pre-harvest drying agent for crops such as dry
- 4 The immediate release of all restricted, allegedly and the U.S. Department of Agriculture (USDA) including the Environmental Protection Agency herbicides by the relevant federal agencies, studies on glyphosate and glyphosate-based (EPA), the Food and Drug Administration (FDA) "trade secret" data from all previous industry

Crops! on Wheat, Oats, Barley and other Food Science Data; End Pre-Harvest Spraying Demand Immediate Release of Industry

valid justification. glyphosate's original patent expired is no longer a on the notion of "trade secrets," which since public and scientific community at large, based legally allowed to keep this information from the immediate release by the EPA, FDA and USDA of all Monsanto and other pesticide manufacturers are the data from corporate controlled scientific studies. Today FOOD DEMOCRACY NOW! is calling for an

wellbeing of the American public. that are supposed to be looking out for the our federal government and the regulatory agencies undermines trust in the safety of our food supply, scientific community is a threat to public health. It fundamental research data from the public and the This lack of scientific integrity is alarming. Hiding

Scientific Review Process **Urgent Need for Fundamental Reforms of**

evidence shows that Roundup and glyphosate are considered safe or extremely low doses. The Roundup and glyphosate, at what were previously continues to show disturbing evidence of harm from independent, peer-reviewed scientific research sponsored research may try to dismiss these companies that supply them with corporate-U.S. and European regulators and the chemical findings. However, a growing body of new

> in the 1970s and 1980s. the original scientific reviews of glyphosate's safety far more toxic than was generally believed during

of Roundup and glyphosate re-authorizations. emerged and must be considered in any new review such as the toxic effects of endocrine disruption, has the real harm that chemicals can cause at low levels, Since that time, new scientific understandings of



please contact: For comments on this report

David Murphy,

fooddemocracynow.org www.fooddemocracynow.org, dave@ Executive Director, Food Democracy Now!

Henry Rowlands,

Director, The Detox Project

www.detoxproject.org, henry@detoxproject.org

Food Democracy Now!:

www.fooddemocracynow.org

our natural environment, sustains farmers and to building a sustainable food system that protects more than 650,000 farmers and citizens dedicated nourishes families. Food Democracy Now! is a grassroots movement of

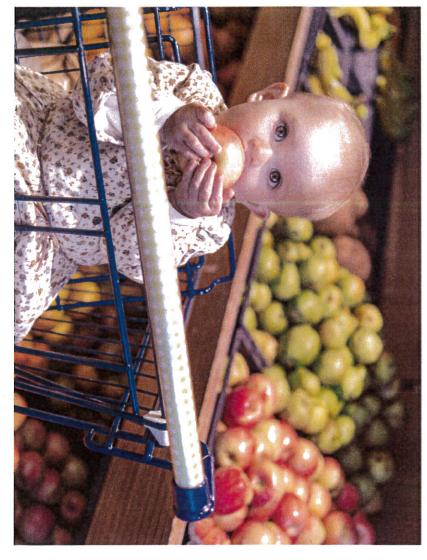
profits. We believe that working together, we can respects the dignity of the farmers who produce conservation, and animal welfare over corporate organic farms, and protecting the environment supporting the growth of humane, natural and it. We believe in recreating regional food systems, our communities equal access to healthy food, and make this vision a reality in our lifetimes. We value our children's health, worker's rights, We know we can build a food system that gives

The Detox Project:

www.detoxproject.org

chemicals in our bodies and in our food at a very awareness to the public by testing for man-made personal level. The Detox Project is a research platform that brings

made chemicals are in your body and in your food! We believe you have the right to know what man-



About the Authors

David Murphy

Dave is the founder and executive director of Food Democracy Now!, a grassroots movement of more than 650,000 American farmers and citizens dedicated to reforming policies relating to food, agriculture and the environment.

In 2006, Murphy moved back to lowa to help stop a factory farm from being built near his sister's farm. After seeing the loss of basic democratic rights of rural lowans, Murphy decided to stay in lowa to fight for lowa's farmers and rural residents and expose the flaws of industrial agriculture to help create a more sustainable future for all Americans.

In 2012, Murphy served as the co-chair of California's Prop 37, a ballot initiative to label genetically engineered foods. Following a narrow lost phelped write and pass the first two GMO labeling bills in Connecticut and Maine in 2013. His writing has appeared in *The Nation, The Hill, The Huffington Post* and *The New York Times*.

Food Democracy Now! Glyphosate: Unsafe on Any Plate

Henry Rowlands

Henry was brought up on a family run organic sheep farm in the Pembrokeshire National Park in Wales. His connection to both farming and the protection of the Welsh countryside led to a deep interest in issues related to sustainable agriculture from a young age.

Following work as a Journalist in many countries across Europe, Henry moved on to set up one of the World's most successful Sustainable Agriculture online news sources "Sustainable Pulse" which focuses on GMOs and pesticides. Sustainable Pulse now has a regular readership of over 100,000 people per month from over 125 countries.

Sustainable Pulse is also involved in a number of reference projects, all of which have the aim of educating the public on the problems surrounding the overuse of pesticides. These include The Detox Project, which has set up a unique pesticide testing platform across America.

References

- "Acreage for Genetically Modified Crops Declined in 2015," The New Mesnage R, Arno M, Costanzo M, Malatesta M, Seralini GE, Antoness/acreage-for-genetically-modified-crops-declined-in-2015.html. York Times, April 13, 2016 http://www.nytimes.com/2016/04/13/busi-
- ney damage following chronic ultra-low dose Roundup exposure.
 Environ Health. 2015;14:70. http://ehjournal.biomedcentral.com/articles/10.1186/s12940-015-0056-1 niou MN. Transcriptome profile analysis reflects rat liver and kid-
- ics.biomedcentral.com/articles/10.1186/s12864-015-1254-5 BMC Genomics 2015 Jan 31;16:32. PMID: 25636363 http://bmcgenomstress responses in brown trout exposed to glyphosate and Roundup. strates induction of oxidative stress and of compensatory cellular Uren Webster TM, Santos EM, Global transcriptomic profiling demon-
- 4 Larsen K, Najle R, Lifschitz A, Virkel G. Effects of sub-lethal exposure transferase enzyme activities, levels of reduced glutathione and lipid peroxidation in liver, kidneys and small intestine. Environ Toxicol Pharof rats to the herbicide glyphosate in drinking water: glutathione ncbi.nlm.nih.gov/pubmed/23044091 macol. 2012;34:811-8. doi: 10.1016/j.etap.2012.09.005. https://www.
- 5 ics.biomedcentral.com/articles/10.1186/s12864-015-1254-5. BMC Genomics 2015 Jan 31;16:32. PMID: 25636363 http://bmcgenomstress responses in brown trout exposed to glyphosate and Roundup strates induction of oxidative stress and of compensatory cellular Uren Webster TM, Santos EM. Global transcriptomic profiling demon-
- 6 of Environmental and Analytical Toxicology 2012, S:4. http://www.omicsonline.org/teratogenic-effects-of-glyphosate-based-herbicides-di-\$4-006.pdf Divergence of regulatory decisions from scientific evidence. Journal Antoniou M et al. Teratogenic effects of glyphosate-based herbicides vergence-of-regulatory-decisions-from-scientific-evidence-2161-0525
- United States Patent 3,160,632 (1964) Stauffer Chemical: http://l.usa
- United States Patent 3,799,758 (1974) Franz, Assignee Monsanto: http://l.usa.gov/1BZlu02
- "How Much Money Does Monsanto Make From Roundup?," The Motley Fool, May 26, 2016. http://www.fool.com/investing/2016/05/26/ how-much-money-does-monsanto-make-from-roundup.aspx.
- ಠ Cakmak I, Yazici A, Tutus Y, Ozturk L. Glyphosate reduced seed and leaf concentrations of calcium, manganese, magnesium, and iron in non-glyphosate resistant soybean. Eur J Agron. 2009;31:114-119.
- = Romheld V. Relevance of glyphosate transfer to non-target plants via the rhizosphere. J Plant Dis Prot. 2006;20:963-969. Neumann G, Kohls S, Landsberg E, Stock-Oliveira Souza K, Yamada T,
- 12 Huber DM. What about glyphosate-induced manganese deficiency? Fluid J. 2007:20-22.
- 13 Bott S, Tesfamariam T, Candan H, Cakmak I, Römheld V, Neumann G. status in glyphosate-resistant soybean (Glycine max L.). Plant Soil. Glyphosate-induced impairment of plant growth and micronutrient 2008;312(1-2):185-194. doi:10.1007/s11104-008-9760-8
- 15 4 Zobiole LHS, de Oliveira RS, Huber DM, et al. Glyphosate reduces Zobiole LH, de Oliveira RS, Visentainer JV, Kremer RJ, Bellaloui N, Yamada T. Glyphosate affects seed composition in glyphosate-resistant soybean. J Agric Food Chem. 2010;58:4517-22. doi:10.1021/jf904342t.
- 16 Kremer, R. J.; Means, N. E. Glyphosate and glyphosate resistant crop soybeans. Plant Soil. 2010;328:57-69. shoot concentrations of mineral nutrients in glyphosate-resistant
- 17 Krüger M, Schrödl W, Neuhaus J, Shehata AA. Field investigations interactions with rhizosphere microorganisms. Eur. J. Agron. 2009, 31
- 8 http://l.usa.gov/llEMmWz United States Patent 7,771,736 (2010) Abraham, Assignee Monsanto: 2013;3(5). doi: http://dx.doi.org/10.4172/2161-0525.1000186. of glyphosate in urine of Danish dairy cows. J Env Anal Toxicol.

4

- 19 rope.springeropen.com/articles/10.1186/s12302-016-0070-0. Benbrock, C. Trends in the use of glyphosate herbicide in the U.S. and globally. Environmental Sciences Europe. 2015;28(3). http://enveu-
- 21 20 Glyphosate Map of America, Detox Project, Estimated Agricultural "Glyphosate Now the Most-Used Agricultural Chemical Ever," Use 1992 thru 2012. Source: USGS, Pesticide National Synthesis Projsate-now-most-used-agricultural-chemical-ever-422419. February 2, 2016, Newsweek http://www.newsweek.com/glyphoect., http://detoxproject.org/glyphosate-map-of-america/

42

- 22 National Water-Quality Assessment (NAWQA) Program, Pesticide National Synthesis Project, Estimated Agricultural Use for Glyphosate map.php?year=2013&map=GLYPHOSATE&hilo=L. 1992 to 2013. https://water.usgs.gov/nawqa/pnsp/usage/maps/show
- 23 USDA ERS (2015). Adoption of genetically engineered crops in the U.S. USDA Economic Research Service. http://www.ers.usda.gov/ recent-trends-in-ge-adoption.aspx data-products/adoption-of-genetically-engineered-crops-in-the-us/
- 25 24 "U.S. researchers find Roundup chemical in water, air," August 31, tion-idUSTRE77U61720110831. 2011, Reuters http://www.reuters.com/article/us-glyphosate-pollu-
- org/10.1002/etc.431. Chang FC, Simcik MF, Capel PD. 2011. Occurrence and fate of the in the atmosphere. Environ Toxicol Chem 30:548-555. http://dx.doi herbicide glyphosate and its degradate aminomethylphosphonic acid
- 26 the United States. Pest Manag Sci 2015 Coupe RH, Capel PD: Trends in pesticide use on soybean, corn and cotton since the introduction of major genetically modified crops in
- "EPA tosses aside safety data, says Dow pesticide for GMOs won't cagotribune.com/news/watchdog/ct-gmo-crops-pesticide-resistance harm people," December 8, 2015, Chicago Tribune. http://www.chi-

27

28 "Why is Glyphosate Sprayed on Crops Right Before Harvest?," March 5, 2016, EcoWatch. http://www.ecowatch.com/why-is-glyphosatesprayed-on-crops-right-before-harvest-1882187755.html

met-20151203-story.html

Chem. 59 (2013) 59-72. http://www.sciencedirect.com/science/article/ Hird, S.J. et al, Liquid chromatography-mass spectrometry for the determination of chemical contaminants in food, TrAC Trends Anal. pii/S0165993614000971.

29

- 3 30 ResearchGate, Best method to detect pesticide (exposure) in blood "Glyphosate Testing Revolution - The New Science, Sustainable Pulse the-glyphosate-testing-revolution/#.V_mePWZSk1l. April 20, 2016. http://sustainablepulse.com/2016/04/20/a-guide-to-
- 32 one_suggest_which_is_the_best_method_to_detect_pesticide_expo sure_in_blood_samples. samples, July 15, 2014. https://www.researchgate.net/post/Can_any-
- "FDA to Start Testing for Glyphosate in Food," February 17, 2016, Time. http://time.com/4227500/fda-glyphosate-testing/

33

- cal-glyphosate-.testing-102183/. "Roundup Chemical Glyphosate Found in 93% of Americans," About Lawsuits, June 1, 2016 http://www.aboutlawsuits.com/roundup-chemi
- 34 35 man-breast-milk. de. http://www.thelocal.de/20150626/concerns-over-safety-of-ger-"Greens warn: German breast milk unsafe,", June 26, 2016, The Local
- cide-beer-germany/. ary 26, 2016, RT. https://www.rt.com/news/333679-cancer-pesti-"Cancer-linked pesticide found in popular German beer," Febru-
- 36 "150 European Parliament Members to Test Urine for Glyphosate," EcoWatch, April 11, 2016. http://www.ecowatch.com/150-europetain-monsantos-cancer-causing-glyphosate-1882112780.html October 26, 2015. http://www.ecowatch.com/85-of-tampons-con-"85% of Tampons Contain Monsanto's 'Cancer Causing' Glyphosate,"

37

business-industry/farmingfood/pesticides. (PRiF) UDECoPRiF: Monitoring program. http://www.food.gov.uk/

an-parliament-members-to-test-urine-for-glyphosate-1891081633

38

39

- ture; 2013 Soybean by Pesticide. Washington, D.C: U.S. Department of Agricul-Agricultural Marketing Service. Pesticide data program annual summary, program year 2011. In: Appendix C Distribution of Residues in
- 40 Mesnage R, Arno M, Costanzo M, Malatesta M, Seralini GE, Antocles/211402278-3-What-are-glyphosate-s-health-effects-EPA, Drinking Water Contaminants - Standards and Regulations, sate's health effects?. https://safewater.zendesk.com/hc/en-us/arti-Table of Regulated Drinking Water Contaminants, What are glypho-
- cles/10.1186/s12940-015-0056-1 Environ Health. 2015;14:70. http://ehjournal.biomedcentral.com/artiney damage following chronic ultra-low dose Roundup exposure niou MN. Transcriptome profile analysis reflects rat liver and kid-
- a Roundup-tolerant genetically modified maize. Environ Sci Europe. 2014;26:14. http://enveurope.springeropen.com/articles/10.1186/ Seralini GE, Clair E, Mesnage R, Gress S, Defarge N, Malatesta M, et al. Republished study: long-term toxicity of a Roundup herbicide and

- 43 Uren Webster TM, Santos EM. Global transcriptomic profiling demonics.biomedcentral.com/articles/10.1186/s12864-015-1254-5 BMC Genomics 2015 Jan 31;16:32. PMID: 25636363 http://bmcgenom strates induction of oxidative stress and of compensatory cellular stress responses in brown trout exposed to glyphosate and Roundup
- 44 Larsen K, Najle R, Lifschitz A, Virkel G. Effects of sub-lethal exposure ncbi.nlm.nih.gov/pubmed/23044091/ macol. 2012;34:811-8. doi: 10.1016/j.etap.2012.09.005. https://www. transferase enzyme activities, levels of reduced glutathione and lipid peroxidation in liver, kidneys and small intestine. Environ Toxicol Pharof rats to the herbicide glyphosate in drinking water: glutathione

63

62

- 45 EPA, Drinking Water Contaminants - Standards and Regulations, ter-contaminants#Inorganic gov/ground-water-and-drinking-water/table-regulated-drinking-wa-Table of Regulated Drinking Water Contaminants. https://www.epa
- 46 sustainablepulse.com/2016/06/06/great-glyphosate-rebellion-contin porary License Extension," Sustainable Pulse, June 6, 2016. http:// "Great Glyphosate Rebellion Continues as Europe Refuses Tem-
- 47 usa-monsanto-lawsuits-idUSKCNOS92H720151015. link," Reuters, October 15, 2015. http://www.reuters.com/article/us-"U.S. lawsuits build against Monsanto over alleged Roundup cancer ues-as-europe-refuses-temporary-license-extension/#.V_b8m2ZSI61
- 48 a_b_9852216.html. www.huffingtonpost.com/carey-gillam/what-killed-jack-mccall-Against Monsanto Takes Root," Huffington Post, May 6, 2016 http:// "What Killed Jack McCall? A California Farmer Dies and a Case

67

- 49 https://www.baumhedlundlaw.com/toxic-tort-law/monsanto-round-Monsanto Roundup Lawsuit, Baum, Hedlund, Aristei and Goldman.
- 50 disrupting-chemicals-150bn-a-year-europe-says-study. theguardian.com/environment/2015/mar/06/health-costs-hormonein Europe, says study," The UK Guardian, March 6, 2015. https://www "Health costs of hormone disrupting chemicals over €150bn a year
- 51 and leaf concentrations of calcium, manganese, magnesium, and iron in non-glyphosate resistant soybean. Eur. J. Agron. 2009, 31, 114-119. Cakmak, I.; Yazici, A.; Tutus, Y.; Ozturk, L. Glyphosate reduced seed http://research.sabanciuniv.edu/13147/.
- 52 escherichia coli and salmonella enterica serovar typhimurium. mBio acid, and glyphosate cause changes in antibiotic susceptibility in formulations of the herbicides dicamba, 2,4-dichlorophenoxyacetic W, Gibson P, Heinemann JA et al. Sublethal exposure to commercial Kurenbach B, Marjoshi D, Amabile-Cuevas CF, Ferguson GC, Godsoe
- 53 Glyphosate: not JUST a carcinogen, Wheat Belly Blog, Dr. William Davis, October 12, 2015 http://www.wheatbellyblog.com/2015/10/gly-2015;6:2. http://mbio.asm.org/content/6/2/e00009-15.
- 54 botulinum. Anaerobe 2013;20:74-78. https://www.ncbi.nlm.nih.gov/ Krüger M, Shehata AA, Schrödl W, Rodloff A. Glyphosate suppresses the antagonistic effect of Enterococcus spp. on Clostridium phosate-not-just-a-carcinogen/.

71

55 glyphosate on potential pathogens and beneficial members of poultry microbiota in vitro. Curr Microbiol. 2013;66(4):350-8. http://link. Shehata AA, Schrodl W, Aldin AA, Hafez HM, Kruger M. The effect of springer.com/article/10.1007%2Fs00284-012-0277-2. pubmed/23396248.

72

- 57 56 Thongprakaisang S, Thiantanawat A, Rangkadilok N, Suriyo T, Sata-2013;38C:1-15. https://www.ncbi.nlm.nih.gov/pubmed/22419778. should be based on the principles of endocrinology. Reprod Toxicol. DH, et al. Regulatory decisions on endocrine disrupting chemicals Vandenberg LN, Colborn T, Hayes TB, Heindel JJ, Jacobs DR, Lee yavivad J. Glyphosate induces human breast cancer cells growth via
- 58 al. Republished study: long-term toxicity of a Roundup herbicide and a Roundup-tolerant genetically modified maize. Environ Sci Europe. Seralini GE, Clair E, Mesnage R, Gress S, Defarge N, Malatesta M, et 2014;26:14. https://enveurope.springeropen.com/articles/10.1186/

pepmc.org/abstract/med/23756170.

estrogen receptors. Food Chem Toxicol. 2013;59C:129-36. http://euro

60 59 Mesnage R, Bernay B, Seralini GE. Ethoxylated adjuvants of glypho-2013;38C:1-15. https://www.ncbi.nlm.nih.gov/pubmed/22419778. should be based on the principles of endocrinology. Reprod Toxicol DH, et al. Regulatory decisions on endocrine disrupting chemicals Vandenberg LN, Colborn T, Hayes TB, Heindel JJ, Jacobs DR, Lee s12302-014-0014-5.

sate-based herbicides are active principles of human cell toxicity, Toxicology. 2013;313(2-3):122-8. http://europepmc.org/abstract/

- 61 phosate-based herbicides: Divergence of regulatory decisions from scientific evidence. J Env Anal Toxicol. 2012;S4:006. doi:10.4172/2161-0525.54-006. Antoniou M, Habib MEM, Howard CV, et al. Teratogenic effects of gly-
- Romano RM, Romano MA, Bernardi MM, Furtado PV, Oliveira CA. Prepubertal exposure to commercial formulation of the herbicide Glyphosate alters testosterone levels and testicular morphology. Arch Toxicol. 2010;84:309-317.
- Benedetti AL, Vituri C de L, Trentin AG, Domingues MA, Alvarez-Silva Glyphosate-Biocarb. Toxicol Lett. 2004;153:227-232. doi:10.1016/j. M. The effects of sub-chronic exposure of Wistar rats to the herbicide tox/et.2004.04.008.
- 64 fects of the formulation of glyphosate-surfactant herbicides on hemodynamics in swine. Clin Toxicol Phila Pa. 2009;47(7):651-658 pubmed/22787363. doi:10.1080/15563650903158862. https://www.ncbi.nlm.nih.gov/ Lee H-L, Kan C-D, Tsai C-L, Liou M-J, Guo H-R. Comparative ef-
- 65 Adam A, Marzuki A, Abdul Rahman H, Abdul Aziz M. The oral and pubmed/9167243. Vet Hum Toxicol. 1997;39(3):147-151. https://www.ncbi.nlm.nih.gov/ intratracheal toxicities of ROUNDUP and its components to rats.
- 66 "Roundup: Birth Defects Caused By World's Top-Selling Weedkiller post.com/2011/06/24/roundup-scientists-birth-defects_n_883578. Scientists Say," Huffington Post, June 24, 2011 http://www.huffington-
- cess/the-formation-of-doxorubicin-loaded-targeted-nanoparticles-us of glyphosate-based herbicides: Divergence of regulatory deci-Antoniou M, Habib MEM, Howard CV, et al. Teratogenic effects certr-2157-7439-1000379.php?aid=74534. ingnanoprecipitation-double-emulsion-and-single-emulsion-for-candoi:10.4172/2161-0525.S4-006. http://www.omicsonline.org/open-acsions from scientific evidence. J Env Anal Toxicol. 2012;S4:006.
- 68 scribd.com/document/57155616/VOLUME3-1-GLYPHOSAT-05. Released by the German Federal Agency for Consumer Protection Rapporteur member state, Germany. 1998. Monograph on Glyphosate and Food Safety, BVL. Volume 3-1_Glyphosat_05.pdf https://www.
- 69 of rats to the herbicide glyphosate in drinking water: glutathione transferase enzyme activities, levels of reduced glutathione and lipid Larsen K, Najle R, Lifschitz A, Virkel G. Effects of sub-lethal exposure ncbi.nlm.nih.gov/pubmed/23044091. peroxidation in liver, kidneys and small intestine. Environ Toxicol Pharmacol. 2012;34(3):811-818. doi:10.1016/j.etap.2012.09.005. https://www
- 70 yavivad J. Glyphosate induces human breast cancer cells growth via estrogen receptors. Food Chem Toxicol. 2013;59:129-136. doi:10.1016/j. Thongprakaisang S, Thiantanawat A, Rangkadilok N, Suriyo T, Satafct.2013.05.057. https://www.ncbi.nlm.nih.gov/pubmed/23756170.
- to Executive Law § 63(15). New York: Attorney General of the State of New York, Consumer Frauds and Protection Bureau, Environmental EPA 40 CFR Part 180 [EPA-HQ-OPP-2012-0132; FRL-9384-3] Protection Bureau santo Company, Respondent. Assurance of Discontinuance Pursuant Attorney General of the State of New York 1996. In the Matter of Mon
- Closed July 1 2013. https://www.regulations.gov/document?D=E-Pesticide Tolerances: Glyphosate, Rule document issued by Environgov/fdsys/pkg/FR-2013-05-01/pdf/2013-10316.pdf. Glyphosate; Pesticide Tolerances, Federal Register/ Vol. 78, No. 84 mental Protection Agency, Regulations dot gov, Comment Period / Wednesday, May 1, 2013 / Rules and Regulations https://www.gpo

73

- org/10.1186/s12302-016-0070-0. globally. Environmental Sciences Europe. 2015;28(3). http://dx.doi Benbrock C. Trends in the use of glyphosate herbicide in the U.S. and PA-HQ-OPP-2012-0132-0009.
- "EPA raises levels of glyphosate residue allowed in food," phosate-residue-allowed-your-. neighborhood/world-our-backyard/2013/jul/5/epa-raises-levels-glyweb/20130709080009/http://communities.washingtontimes.com/ July 5, 2013, The Washington Times. https://web.archive.org/
- http://www.sciencedirect.com/science/article/pii/S030881461301920 cumulates in Roundup Ready GM soybeans. Food Chem 153:207-215 Bohn T, Cuha M, Traavik T, Sanden M, Fagan J, Primicerio R (2014) Compositional differences in soybeans on the market: glyphosate ac-
- Science. http://www.independentsciencenews.org/news/how-ex-"How 'Extreme Levels' of Roundup in Food Became the Industry treme-levels-of-roundup-in-food-became-the-industry-norm/ Norm," March 24, 2014, Thomas Bøhn and Marek Cuhra, Independent

77

76

75

74

- 78 "UCSF Presentation Reveals Glyphosate Contamination in People across America," May 25, 2016, The Detox Project. http://detoxproject
- 79 29, 2016, EcoWatch. http://www.ecowatch.com/glyphosate-found-in urine-of-93-percent-of-americans-tested-1891146755.html "Glyphosate Found in Urine of 93 Percent of Americans Tested," May
- 80 Krüger M, Schledorn P, Schrödl W, Hoppe HW, Lutz W, et al. (2014) Detection of Glyphosate Residues in Animals and Humans. J Environ
- 8 and contaminants in food." Environmental Health Criteria 70 http:// WHO (1987). "Principles for the safety assessment of food additives www.inchem.org/documents/ehc/ehc/ehc70.htm#SectionNumber:5.5
- 82 olism(1998) Released by German government agency BVL. www.scribd.com/doc/57155616/VOLUME3-1-GLYPHOSAT-05 Monograph on Glyphosate. Annex B-5.10.2: Toxicology and Metab-
- 83 For EPA's setting of the glyphosate ADI at 0.1 mg/kg/day in the early wheat. March 3, 1983. 1980s (vs. 1.75 today), see EPA (1983). Glyphosate (Roundup) on
- 84 "Monsanto Knew of Glyphosate Cancer Link 35 Years Ago," Sustainable Pulse, April 9, 2015 http://sustainablepulse.com/2015/04/09/
- monsanto-knew-of-glyphosate-cancer-link-35-years-ago/
- 86 85 EPA SECOND Peer Review of Glyphosate, The Health Effects Division (HED) Carcinogenicity Peer Review Committee (CPRC) June 26, 1991
- 87 Rapporteur member state, Germany. 1998. Monograph on Glyphosate Rapporteur member state, Germany. 1998. Monograph on Glyphosate. Released by the German Federal Agency for Consumer Protection scribd.com/document/57155616/VOLUME3-1-GLYPHOSAT-05 and Food Safety, BVL. Volume 3-1_Glyphosat_05.pdf https://www.

106

- For EPA's setting of the glyphosate ADI at 0.1 mg/kg/day in the early and Food Safety, BVL. Volume 3-1_Glyphosat_05.pdf https://www. Released by the German Federal Agency for Consumer Protection scribd.com/document/57155616/VOLUME3-1-GLYPHOSAT-05
- 88 1980s (vs. 1.75 today), see EPA (1983). Glyphosate (Roundup) on wheat. March 3, 1983.
- 90 89 Mesnage et al. Transcriptome profile analysis reflects rat liver and kidney damage following chronic ultra-low dose Roundup exposure. Released by the German Federal Agency for Consumer Protection and Food Safety, BVL. Volume 3-1_Glyphosat_05.pdf https://www. Rapporteur member state, Germany. 1998. Monograph on Glyphosate scribd.com/document/57155616/VOLUME3-1-GLYPHOSAT-05.
- 91 of Environmental and Analytical Toxicology 2012, S:4. http://www.om-icsonline.org/teratogenic-effects-of-glyphosate-based-herbicides-di-vergence-of-regulatory-decisions-from-scientific-evidence-2161-0525. Divergence of regulatory decisions from scientific evidence, Journal Antoniou M et al. Teratogenic effects of glyphosate-based herbicides com/articles/10.1186/s12940-015-0056-1. Environmental Health 2015;14:70. https://ehjournal.biomedcentral.
- 92 gmwatch.org/news/latest-news/16375-gene-expression-analysis-confirms-roundup-causes-liver-and-kidney-damage-at-very-low-doses. "Gene expression analysis confirms Roundup causes liver and kidney damage at very low doses," GMWatch, August 25, 2015. http://www.
- 93 Monsanto Europe, December 1995.
- Richard S, Moslemi S, Sipahutar H, Benachour N, Seralini G-E (2005) www.ncbi.nlm.nih.gov/pmc/articles/PMC1257596/. cells and aromatase. Environ Health Perspect 113:716-720. https:// Differential effects of glyphosate and roundup on human placental
- 95 Mesnage R, Defarge N, Spiroux de Vendômois J, Séralini GE (2014) com/journals/bmri/2014/179691/citations/. active principles. Biomed Res Int 2014:179691 https://www.hindawi. Major pesticides are more toxic to human cells than their declared

114

- 96 Johal, G.R. and Huber, D.M. 2009. Glyphosate effects on diseases of bc.ca/rcbtoa/services/huber-glyphosates-2009.pdf. plants. European J. Agron. 31:144-152. http://www.certifiedorganic.
- 97 Scientist warns of dire consequences with widespread use of glynon-gmoreport.com/articles/may10/consequenceso_widespread_glyphosate," The Organic and Non-GMO Report, May 2010. http://www.
- 98 Cells below Toxic Levels. International Journal of Environmental Research and Public Health, 13(3), 264. http://doi.org/10.3390/ Glyphosate-Based Herbicides Disrupt Aromatase Activity in Human Defarge, N., Takács, E., Lozano, V. L., Mesnage, R., Spiroux de Vendômois, J., Séralini, G.-E., & Székács, A. (2016). Co-Formulants in

- 100 99 "Weed-Whacking Herbicide Proves Deadly to Human Cells," Scientific "New Evidence About the Dangers of Monsanto's Roundup," The dence-about-the-dangers-of-monsantos-roundup/. Intercept, May 17, 2016. https://theintercept.com/2016/05/17/new-evi-
- weed-whacking-herbicide-p/ American, June 23, 2009. http://www.scientificamerican.com/article/
- 0 Apoptosis and Necrosis in Human Umbilical, Embryonic, and Placental Cells." [In eng.]. Chem Res Toxicol 22, no. 1 (Jan 2009): 97-105. https:// Benachour, N., and G. E. Seralini. "Glyphosate Formulations Induce www.ncbi.nlm.nih.gov/pubmed/19105591.
- 102 Krüger M, Schledorn P, Schrödl W, Hoppe HW, Lutz W, et al. (2014) Detection of Glyphosate Residues in Animals and Humans-2161-0525.1000210.php?aid=23853 open-access/detection-of-glyphosate-residues-in-animals-and-humans. J Environ Anal Toxicol 4: 210. http://www.omicsonline.org/
- 103 Safety Evaluation on Glyphosate and Roundup Herbicide (Updated November 2014), Williams, Gary M. Kroes, Robert, Munro, Ian C. Monsanto, Backgrounder: Summary on Human Risk Assessment and man-risk-assessment-and-safety-evaluation.pdf. http://www.monsanto.com/glyphosate/documents/summary-of-hu-
- 104 USEPA. 1993. Reregistration Eligibility Decision (RED) Glyphosate. Of fice of Prevention, Pesticides and Toxic Substances. Washington DC
- 105 Krüger M, Schledorn P, Schrödl W, Hoppe HW, Lutz W, et al. (2014) Anal Toxicol 4: 210. Detection of Glyphosate Residues in Animals and Humans. J Environ
- pubmed/24985121. Enzymes in Rats. Int J Toxicol 2014. https://www.ncbi.nlm.nih.gov/ Larsen K, Najle R, Lifschitz A, Mate ML, Lanusse C, Virkel GL. Effects tion on Metabolic Activities of Different Xenobiotic-Metabolizing of Sublethal Exposure to a Glyphosate-Based Herbicide Formula-
- 107 pmc/articles/PMC3349285/heb. trum of autoimmune diseases, chronic inflammatory diseases and cancer. Anticancer Res. 2012;32:1119-36. https://www.ncbi.nlm.nih.gov/ Franks AL, Slansky JE. Multiple associations between a broad spec-
- 108 monoll2-09.pdf. IARC Monongraph Glyphosate is probably carcinogenic to humans (Group 2A) 2015, http://monographs.iarc.fr/ENG/Monographs/vol112/
- 109 Parks CG, Hoppin JA, DeRoos AJ, Costenbader KH, Alavanja, MC, Sandler DP. 2016. Rheumatoid arthritis in Agricultural Health Study spouses: associations with pesticides and other farm exposures. ehp129/. Environ Health Perspect; doi:10.1289/EHP129 http://ehp.niehs.nih.gov/
- 10 International, Programme on Chemical Safety (IPCS), Pesticide news/17022-glyphosate-link-with-rheumatoid-arthritis-shown-in-new GMWatch, June 12, 2016 http://www.gmwatch.org/news/latest-"Glyphosate link with rheumatoid arthritis shown in new study,"

Ξ

- 112 to Executive Law § 63(15). New York: Attorney General of the State santo Company, Respondent. Assurance of Discontinuance Pursuant Attorney General of the State of New York 1996. In the Matter of Mon stream/10665/43624/1/9241665203_eng.pdf. Residues in Food 2004, Evaluations Part II Toxicological, Joint FAO/WHO Meeting on Pesticide Residues. http://apps.who.int/iris/bit-
- 113 "Monsanto Fined in France for 'False' Herbicide Ads." TerraDaily.com January 27, 2007. http://www.terradaily.com/2006/070126154451.

of New York, Consumer Frauds and Protection Bureau, Environmental

Oates L, Cohen M, Braun L, Schembri A, Taskova R. Reduction in urinih.gov/pubmed/24769399 nary organophosphate pesticide metabolites in adults after a weeklong organic diet. Environ Res. 2014;132:105-111. https://www.ncbi.nlm